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Trustee

8 UNITED STATES BANKRUPTCY COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11
12 In re
13 Gabriel Technologies Corporation, a Delaware
corporation; and Trace Technologies LLC, a
14 Nevada limited liability company,

15 Administratively
16 Consolidated Debtors,

Case No. 13-30340 (DM) (administratively
consolidated with Case No. 13-30341
(DM))

Chapter 7

**NOTICE OF RESCHEDULED
HEARING ON JOINT MOTION TO
APPROVE SETTLEMENTS AND
GRANT RELATED RELIEF**

Date: July 26, 2019
Time: 10:30 a.m.
Place: United States Bankruptcy Court
450 Golden Gate Ave.,
Courtroom 17
San Francisco, CA 94102
Judge: Hon. Dennis Montali

21 **TO: ALL CREDITORS OF GABRIEL TECHNOLOGY CORP. AND TRACE
22 TECHNOLOGY, LLC, INTERESTED PARTIES, THE OFFICE OF THE UNITED
STATES TRUSTEE, AND**

23 **ALL CREDITORS AND FORMER PARTNERS IN NORTHWATER
24 INTELLECTUAL PROPERTY FUND, L.P. 3A**

25 **PLEASE TAKE NOTICE THAT** the hearing originally set for June 28, 2019 at 10:30 a.m.
on the Joint Motion to Approve Settlements and Grant Related Relief filed by Qualcomm
Incorporated, Kavita Gupta (“Trustee”), Chapter 7 trustee for the estates of Gabriel Technology Corp.
and Trace Technologies, L.L.C. (“Debtors Estates”), and GBC HoldCo, LP, IP Successor Fund 21
L.P., and Lake Bridge Capital Inc. (“Motion”) has been rescheduled to July 26, 2019 at 10:30 a.m.

1 **PLEASE TAKE FURTHER NOTICE THAT** the rescheduled hearing will take place before
2 the Hon. Dennis Montali in Courtroom 17 at the United States Bankruptcy Court for the Northern
3 District of California, 450 Golden Gate Avenue, 16th Floor, San Francisco, California 94102.

4 **PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Bankruptcy Rule 90141(c)(1),
5 any objection to the relief requested in the Motion, including the relief seeking a determination that:

- 6 o prior to the filing of its Certificate of Cancellation on August 18, 2017, Northwater Intellectual
7 Property Fund, L.P. 3A (“Northwater”) validly and effectively assigned all of its rights, claims, and
8 interests (including security interests) held against the Debtors under a certain Note Purchase
9 Agreement (the “NPA”) and a certain Senior Secured Promissory Note dated September 16, 2011
10 (“Secured Note”), as well as all rights it held under Proof of Claim Nos. 137-1 and 159-1 (the
11 “Northwater Claims”) to GBC Holdco, L.P. (“GBC”);
12 o notice and a reasonable opportunity to be heard was provided to all persons and entities who are or
13 were creditors or partners of Northwater on or at any time after August 15, 2016;
14 o the distribution to be made by the Trustee on account of the Northwater Claims allowed pursuant
15 to the proposed settlement is payable solely to GBC; and
16 o all creditors and former partners of Northwater Intellectual Property Fund, L.P. 3A, and any person
17 appointed to act as a receiver, trustee, or manager for Northwater pursuant to 6 Del. C. §17-803(b)
18 or similar laws, will be permanently barred, enjoined, and restrained from commencing,
19 prosecuting, or asserting any claims against the Trustee or the Debtors’ Estates in any forum that
20 are predicated upon the Northwater Claims or Northwater’s asserted entitlement to receive a
21 distribution from the assets of the Debtors’ Estates.

22 must be in writing, filed with the Court and served on the undersigned special counsel for the Trustee
23 by no later than seven (7) days prior to the rescheduled hearing date (i.e., July 19, 2019).

24 Dated: June 25, 2019

25 NUTI HART LLP

26 By: /s/ Kevin W. Coleman

27 Kevin W. Coleman (CSBN 168538)
28 Special Counsel for
 Kavita Gupta, Chapter 7 Trustee